Remarks

Entry of the foregoing and reconsideration of the application identified in caption as amended, pursuant to and consistent with the Rules of Practice in Patent Cases, and in light of the remarks which follow, is respectfully requested.

Claims 1 and 37 have been amended and new claim 48 has been added so that claims 1-11 and 37-48 will remain pending upon entry of the present amendment. Support for the amendments to claims 1 and 37 can be found in the published international patent application, which is equivalent to the application as originally filed, at least at page 3, lines 2-4; page 6, line 21 to page 7, line 2; page 7, lines 6-9; page 7, lines 17-19, and Figure 1. Support for new claim 48 can be found in the published international patent application, which is equivalent to the application as originally filed, at least from page 2, line 27 through page 3, line 2. Accordingly, no new matter has been presented by the present amendments.

Claims 1-11 and 37-47 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,578,834 to Stumpf ("Stumpf"). This rejection is respectfully traversed.

Stumpf discloses a method and associated apparatus for manufacturing an innerspring assembly, which is described in detail between column 3, line 63 and column 5, line 20, with reference to Figures 4 and 5. The apparatus includes a plurality of applicators (24) that each have a row of four nozzles (26). The applicators are each mounted for reciprocating motion along a longitudinal axis of a string of pocketed coil springs, and each row of nozzles is orientated perpendicularly to the direction of motion of the applicators, and hence perpendicularly to the longitudinal axis of a string of pocketed coil springs, as shown clearly in Figures 4 and 5. In use, the applicators deposit four dots of adhesive on each pocketed spring as they proceed along the string. Clearly, therefore, the method of manufacture disclosed by Stumpf does not include the step defined by amended Claim 1 of positioning a string of pocketed coil springs in juxtaposition with a row of adhesive applicators disposed on an axis parallel to a longitudinal axis of the string, the row of adhesive applicators extending along the full extent of the string. Instead, the method of manufacture disclosed by Stumpf includes a plurality of applicators that are each mounted for movement along the longitudinal axis of the string so that adhesive can be applied to each pocket of the string.

Furthermore, the specific embodiment shown in Figures 4 and 5 of Stumpf includes two adhesive applicators that move away from each other towards the ends of the string during use (see column 4, lines 15-20 and Figure 4). The method of manufacture disclosed by Stumpf does not therefore include a plurality of adhesive applicators disposed in mutually fixed relation, as defined by amended Claim 1.

Accordingly, Stumpf fails to disclose or suggest at least the above-noted features of claim 1 and therefore fails to anticipate our render obvious claims 1-11 and 37-47 of the present application. Withdrawal of the record rejection and allowance of said claims is respectfully requested.

Claims 1-5 and 7-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,016,305 to Suenens ("Suenens '305") in view of Stumpf and/or U.S. Patent No. 6,143,122 to Mossbeck ("Mossbeck '122"). This rejection is respectfully traversed.

Suenens discloses a method of manufacturing an innerspring assembly in which a string of pocketed coil springs (1) is moved underneath a fixed adhesive applicator (11), and adhesive is sprayed either continuously or discontinuously onto the string of pocketed coil springs while the string is moving (see column 4, lines 57-66). Clearly, therefore, the method of manufacture disclosed by Suenens does not include the step of positioning a string of pocketed coil springs in juxtaposition with a plurality of adhesive applicators as defined by amended Claim 1. Instead, the method of manufacture disclosed by Suenens utilizes a single adhesive applicator.

The embodiment disclosed by Mossbeck that is entitled to an earlier priority date than that of amended Claim 1, and in which adhesive is applied from a plurality of adhesive applicators to a string of pocketed coil springs, is described at column 6, lines 32-53, and illustrated in Figure 3, of Mossbeck. In this embodiment, adhesive is sprayed continuously from a pair of nozzles mounted upon a single adhesive applicator (see column 6, lines 49-53) while the applicator is moved in a reciprocating fashion along the longitudinal axis of a string of pocketed coil springs, such that a region of greater concentration of adhesive is produced on each pocketed coil spring (see column 6, lines 45-49).

Clearly, therefore, the method of manufacture disclosed by Mossbeck does not include the step defined by amended Claim 1 of positioning a string of pocketed coil springs in juxtaposition with a row of adhesive applicators disposed on an axis parallel to a

longitudinal axis of the string, the row of adhesive applicators extending along the full extent of the string. Instead, the method of manufacture disclosed by Mossbeck includes a plurality of nozzles that are mounted for movement along the longitudinal axis of the string so that adhesive can be applied to each pocket of the string.

The feature of the present invention that a string of pocketed coil springs is positioned in juxtaposition with a row of adhesive applicators disposed on an axis parallel to a longitudinal axis of the string, the row of adhesive applicators extending along the full extent of the string, is not disclosed or suggested by any of the prior art documents cited by the examiner. Instead, each of the prior art documents cited discloses a method of manufacturing an innerspring assembly that involves moving one or more adhesive applicators along the longitudinal axis of a string of pockets, while applying adhesive to the exterior surface of those pockets, in order to apply adhesive to pockets along the entire length of the string.

In contrast to the prior art, the method of the present invention is able to apply adhesive to pockets along the entire length of the string simultaneously, or substantially simultaneously, and hence achieve an increase in operating speed and throughput. This also provides the advantage that the length of time between dispensing of the adhesive and contacting of the first and second strings may be minimized and is also the same for all parts of the strings, leading to improved and more consistent adhesion. In addition, the present invention enables the amount and/or distribution of adhesive applied to each individual pocket to be readily varied relative to the amount and/or distribution of adhesive applied to other pockets.

Of the prior art documents cited by the examiner, only Stumpf and Mossbeck contain any suggestion of using a plurality of adhesive applicators aligned with a longitudinal axis of the string in a method of manufacturing an innerspring assembly. However, neither Stumpf nor Mossbeck recognize that providing a row of applicators that extends along the entire extent of the string could remove the need for movement of the applicators along the longitudinal axis of the string, and hence achieve an increase in operating speed and throughput Instead, Stumpf and Mossbeck only consider methods of manufacture in which the applicators necessarily move along the longitudinal axis of the string. In particular, the specific examples described in Stumpf and Mossbeck include only two adhesive applicators or nozzles aligned with a longitudinal axis of the string, and in each of those examples the

two applicators or nozzles are necessarily moved along the longitudinal axis of the string so as to apply adhesive to the entire length of the string. Furthermore, Stumpf discusses the use of mechanical sensors or a microprocessor for controlling the application of adhesive to successive pockets of the string as the applicators move along the length of the string (see column 4, lines 3-8), and the regions of greater concentration of adhesive in Mossbeck are actually achieved by the reciprocating motion of the two nozzles along the longitudinal axis of the string (see column 6, lines 45-49).

Accordingly, none of the prior art documents cited by the examiner alone or combined discloses or suggests the step defined by amended Claim 1 of positioning a string of pocketed coil springs in juxtaposition with a row of adhesive applicators disposed on an axis parallel to a longitudinal axis of the string, the row of adhesive applicators extending along the full extent of the string.

For at least the above reasons, Claims 1-5 and 7-11 are not non-obvious over the proposed combination of prior art documents cited by the examiner. Withdrawal of the record rejection and allowance of said claims is respectfully requested.

Claims 6 and 42 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Suenens '305 and Stumpf and or Mossbeck '122 as applied to claims 1 and 37 above, and further in view of the collective teachings of U.S. Patent No. 5,792,305 to Eto ("Eto"), EP 421495 to Suenens et al. ("Suenens '495"), and U.S. Patent No. 6,159,319 to Mossbeck ("Mossbeck '319"). This rejection is respectfully traversed.

Claim 6 depends from claim 1 and claim 42 depends from claim 37. Eto, Suenens '495 and Mossbeck '319 fail to make up for the deficiencies of Stumpf, Suenens '305 and Mossbeck '122 noted above. Claims 6 and 42 are patentable for at least the same reasons as claims 1 and 37 as noted above. Withdrawal of the record rejection and allowance of said claims is respectfully requested.

In view of all of the foregoing, applicant submits that this case is in condition for allowance and such allowance is earnestly solicited.

Respectfully submitted,

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